

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**MARGUERITE HOFFMAN,**

**Plaintiff,**

**VS.**

**L&M ARTS, SOTHEBY'S, INC.,  
TOBIAS MEYER, DAVID MARTINEZ,  
and STUDIO CAPITAL, INC.,**

## Defendants.

www.pearsoned.com

**Civil Action No. 3:10-CV-0953-D**

**AGREED MOTION TO EXTEND TIME TO FILE REPLY  
IN SUPPORT OF PLAINTIFF'S MOTION TO COMPEL**

Plaintiff Marguerite Hoffman (“Hoffman”) files this Agreed Motion to Extend Time to File Reply in Support of Plaintiff’s Motion to Compel, and shows the Court as follows:

1. On March 22, 2012, Hoffman filed Plaintiff's Sealed Motion to Compel Defendants Studio Capital and David Martinez to Produce Documents Concerning Other Art Transactions (the "Motion"), together with a sealed Appendix in support of the Motion [Dkt. Nos. 203 and 204].

2. On April 12, 2012, Defendants Studio Capital and David Martinez filed their Response to the Motion [Dkt. No. 219].

3. Counsel for Hoffman, Studio Capital and David Martinez agree to an extension of the deadline for Hoffman to file her reply in support of the Motion to April 27, 2012.

WHEREFORE, PREMISES CONSIDERED, Plaintiff Marguerite Hoffman prays  
that this Court grant her until April 27, 2012, to file her reply in support of the Motion.

SHACKELFORD, MELTON & MCKINLEY  
LLP

By: /s/ Brian P. Shaw  
Bart Wulff  
State Bar No. 22086100  
Brian P. Shaw  
State Bar No. 24053473  
3333 Lee Parkway, Tenth Floor  
Dallas, TX 75219  
BWULFF@shacklaw.net  
BSHAW@shacklaw.net  
Tel: (214) 780-1400  
Fax: (214) 780-1401

WILLKIE FARR & GALLAGHER LLP

Roger Netzer  
Mary Eaton  
Deirdre Hykal  
787 Seventh Avenue  
New York, NY 10019-6099  
rnetzer@willkie.com  
Tel: (212) 728-8000  
Fax: (212) 728-8111

*Attorneys for Plaintiff*

**CERTIFICATE OF CONFERENCE**

On April 26, 2012, Stephen Vogel, counsel for Marguerite Hoffman, conferred with David H. Herrington, counsel for Studio Capital and David Martinez, who agrees to the relief requested in this motion.

/s/ Brian P. Shaw  
Brian P. Shaw

**CERTIFICATE OF SERVICE**

The undersigned certifies that a true copy of the foregoing is being served electronically via ECF on all counsel of record on the 26<sup>th</sup> day of April 2012.

/s/ Brian P. Shaw  
Brian P. Shaw